

Exhibit 4

Wiener, Eric

From: Ben Galdston [BenG@blbglaw.com]
Sent: Wednesday, July 06, 2016 5:57 PM
To: Reddington, Edward; Lucas Gilmore
Cc: Weiss, Noah; Wiener, Eric; Hodges, Kevin
Subject: RE: Meet and Confer

Ed,

We will provide our response on Friday and can schedule a call for early the following week. There appear to be some discrepancies in our search terms that we should address as well.

Regards, Ben

From: Reddington, Edward [mailto:EReddington@wc.com]
Sent: Wednesday, July 6, 2016 1:53 PM
To: Ben Galdston <BenG@blbglaw.com>; Lucas Gilmore <Lucas.Gilmore@blbglaw.com>
Cc: Weiss, Noah <NWeiss@wc.com>; Wiener, Eric <EWiener@wc.com>; Hodges, Kevin <KHodges@wc.com>
Subject: RE: Meet and Confer

Thanks, Ben. When can I anticipate receiving a written response to these issues? The Court suggested the plaintiffs provide this information to HSBC within a week or so of the June 29 hearing. We are already a week out of the hearing. Can you provide your written response by this Friday? Safe travels.

Regards,

Ed

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From: Ben Galdston [<mailto:BenG@blbglaw.com>]
Sent: Wednesday, July 06, 2016 1:46 PM
To: Reddington, Edward <EReddington@wc.com>; Lucas Gilmore <Lucas.Gilmore@blbglaw.com>
Cc: Weiss, Noah <NWeiss@wc.com>; Wiener, Eric <EWiener@wc.com>; Hodges, Kevin <KHodges@wc.com>
Subject: RE: Meet and Confer

Ed,

During our discussion yesterday morning, I indicated that I was traveling to New York for depositions this week and was uncertain of my schedule but would try to make time today or later this week to talk, as time permitted. Unfortunately, it is becoming increasingly difficult to set aside any meaningful amount of time for a meet and confer discussion.

Accordingly, we will respond to the issues you have raised in writing and propose a follow-up meet and confer to discuss any remaining questions you may have.

Thanks, Ben

From: Reddington, Edward [<mailto:EReddington@wc.com>]
Sent: Wednesday, July 6, 2016 1:29 PM
To: Ben Galdston <BenG@blbglaw.com>; Lucas Gilmore <Lucas.Gilmore@blbglaw.com>
Cc: Weiss, Noah <NWeiss@wc.com>; Wiener, Eric <EWiener@wc.com>; Hodges, Kevin <KHodges@wc.com>
Subject: RE: Meet and Confer

Ben—during the meet and confer yesterday, you said you had time to speak with me today concerning the issues below. I have not heard from you yet on a proposed time. Please let me know when you, Lucas or someone else from your firm is available to discuss these issues. If you are no longer available today, please suggest some times on Thursday or Friday.

Regards,

Ed

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From: Reddington, Edward
Sent: Tuesday, July 05, 2016 12:22 PM
To: Ben Galdston <BenG@blbglaw.com>; Lucas Gilmore <Lucas.Gilmore@blbglaw.com>
Cc: Weiss, Noah <NWeiss@wc.com>; Wiener, Eric <EWiener@wc.com>; Hodges, Kevin <KHodges@wc.com>
Subject: Meet and Confer

Ben—as we discussed on today’s call, please let me know the times that you or Lucas are available to meet and confer tomorrow concerning the BlackRock plaintiffs’ document productions. Specifically, we would like to discuss the issues I raised in my July 1 email with respect to the BlackRock plaintiffs’ missing ESI data and missing custodians. To facilitate the discussion, I repeat the issues below.

With respect to the technical state of the productions, several of the BlackRock plaintiffs have made productions but have not provided custodian metadata as required by the ESI order. We are missing such custodian metadata for TIAA, DZ Bank, Sealink, and Kore. Please be ready to explain on the call why you did not produce the required metadata and when you expect to be able to produce it. If you believe you have provided documents from custodial files for TIAA, DZ Bank, Sealink, and Kore, please be ready to tell us which custodians from these entities you have completed producing documents for and which you have not.

With respect to other custodians, on the call please be ready to identify the specific plaintiff custodians from whom documents will still be forthcoming and what you anticipate the volume of these documents to be. To facilitate this discussion, we are including below a list that identifies the specific custodians who we believe are missing. If you think you have produced documents from the custodial files of persons on this list, please be ready to tell us this during the call. If there are persons on this list for whom you have not produced documents, please be ready to confirm that as well.

Finally, even if you have produced documents from the custodial files for some custodians, you may not have completed those productions. On the call, please be ready to tell us any agreed to or ordered custodians for whom you expect to be producing additional documents between now and August 11.

Regards,

Ed

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BlackRock: 12

- o Anderson, Keith
- o Chang, Hui-Chen
- o D'Vari, Ron
- o Khankin, Michael
- o Kopstein, Todd
- o Moeller, Ulf
- o Powers, Laura
- o Reiss, Alexander
- o Smaithangi, Sriram
- o Yalamanchili, Kishore
- o Yu, Sally
- o Zalaznick, Brian

- Prudential: 12

- o Han, Kyuho
- o Heard, Kenneth
- o Ianev, Bogdan (Robert)
- o Kang, Hyunsook (Hannah)
- o Knapp, Frederick
- o Laurita, Thomas
- o Mahmoud, Emad
- o Motta, Scott
- o Motzer, Michelle
- o Newton, Lam
- o Nikitin, Evgeny
- o Zou, Sherry (Qian)

- PIMCO: 10

- o van Akkeren, Marco
- o Bhansali, Vineer
- o Bridwell, Jennifer
- o Bui, Giang
- o Gross, William H.
- o Gu, Haidu
- o Hyman, Dan
- o Ivascyn, Dan
- o Padmanabhan, Lalantika
- o Simon, Scott

- TIAA: 48 (no metadata provided)

- o Albert, Mike
- o Ashton, Keith
- o Atkinson, Keith
- o Bader, Iris
- o Becker, Brandon
- o Bhagat, Victor
- o Black, Lisa
- o Caleca, Paul
- o Carickhoff, Rob
- o Cerra, John
- o Chao, Albert
- o Denize, Yves
- o Dugaw, Marcus
- o Eisenhower, Stacy
- o Feigelson, Jon
- o Forgione, Bill
- o Fulmer (Cho), Shirley
- o Goff, Phil
- o Grosso, Suzanne
- o Haggett, Evan
- o Haines, Michelle
- o Higgins, Joe
- o Honda, Sajeev
- o Koudinov, Youriy
- o Liberatore, Steve
- o Lipton, Andrew
- o Lummus, Jimmy
- o Martin, Bill (William)
- o Martin, Bridget
- o Mattison, Charles
- o McCally, John
- o Moraino, Ian
- o Morriss, John
- o Nabors, Robert (Tim)
- o Nelson, Duane
- o Nelson, Joyce
- o Palmer, Richard
- o Parekh, Aashh
- o Pierre Merritt, Marjorie
- o Price, Tom
- o Pryor, Carranza
- o Quinn, Cathy
- o Rosa, Eileen
- o Saari, Eric
- o Serman, Steven
- o Travaglino, Nick
- o Virgilio, Steve
- o Wilkinson, Bill

- DZ Bank: 8 (no metadata provided)

- o Amendola, Carl

- o Baun, Jeffrey
- o Buckley, Simon
- o Goebler, Wolfgang
- o O'Connor, Nancy
- o Ravinet, Monica
- o Ritz, Bruce
- o Schmidt, Gerhard

- Kore: 5 (no metadata provided)
- o Craft, Darren
- o Herman, Alex
- o Kosinski, Gary
- o Kessler, David
- o Maceira, Julio

- Sealink: 2 (no metadata provided)
- o de Francisci, Paul
- o Glomski, Terrence

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